STONE MAGNANINI

COMPLEX LITIGATION

February 23, 2024

VIA CM/ECF

Hon. Michael A. Hammer Martin Luther King Building and U.S. Courthouse 50 Walnut Street Newark, New Jersey 07102

Re: <u>United States v. Jobadiah Weeks</u> (19-cr-877-CCC)

Your Honor:

Yesterday I received a copy of this Court's Order modifying the conditions of Defendant Jobadiah Weeks' release to home incarceration and restricting travel to the District of Colorado until a bail review hearing is held, which is now scheduled for March 11, 2024. [DKT. 320]. Please be advised that Mr. Weeks intends to fully comply with the Order restricting his movements until the date of the review hearing.

I write with the consent of AUSA Anthony Torntore, who represents the Government, to respectfully request a brief adjournment of the bail review hearing as I have a planned family vacation the week of March 11, as it is a school break for my children. Further, Mr. Weeks has requested that his lead counsel – David Boies – appear at the bail hearing and Mr. Boies is also not available on March 11. Mr. Boies and I are both available on either April 5 or April 8, and we are also generally available the week of April 15.

In light of the above, I am respectfully requesting that the bail review hearing now scheduled for March 11, be briefly postponed. As noted above, AUSA Torntore has consented to this adjournment request.

Respectfully submitted,

_/s/David Stone
David S. Stone
Managing Partner

cc: AUSA Anthony Torntore (via CM/ECF and email)